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August 13, 2021

**VIA ECF**

The Honorable Kenneth M. Karas  
United States District Judge  
Southern District of New York  
300 Quarropas Street,  
White Plains, NY 10601

**Re: United States v. Andrew Perkins, 7:21-cr-00257-KMK-1**

Honorable Judge Karas:

I write to respectfully request that the Court allow Mr. Perkins to move to Rolla, Missouri to reside with his mother. He is currently living in a motel in White Plains. Given the nature of his charges, Mr. Perkins faced difficulty in locating housing that was compliant with his conditions and has been living in a motel since his release. He also struggled to find employment. He learned today that he secured employment in a UPS warehouse, however this is not full time employment. Mr. Perkins has largely depleted what little savings he had and with a limited potential income based on his new employment, he may not be able to afford living in the motel much longer. His mother owns her own home and lives alone. She can provide him both familial and economic support while he is on pre-trial supervision. The Government, through Assistant United States Attorney Jennifer Ong, and Mr. Christopher's Pre-trial Officer, Leonthe Barrios, have no objection to this request.

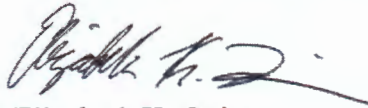
On February 16, 2021, The Honorable Judge Judith C. McCarthy released Mr. Perkins on an unsecured bond of \$50,000, signed by two Financially Responsible Persons, one of whom was his mother, Catherine Perkins, with whom he is now requesting to reside. Further conditions of the bond included the restriction of Mr. Perkins's travels to SDNY/EDNY and DNJ for work purposes; surrendering of all his travel documents and no new applications for such documents; and pretrial supervision as directed by Pretrial Services. Mr. Perkins's bail conditions were met. Since his release, Mr. Perkins has been compliant with his bail conditions and has reported to Pretrial as directed.

Mr. Perkins is hoping to relocate to a more stable environment that would provide both familial and financial support. He respectfully requests that this request be granted. He further requests that condition 7(f) be modified to limit his travel to the Western and Eastern Districts of

Missouri<sup>1</sup> with permission to travel to the SDNY/EDNY for attorney visits and court appearances.

Thank you for your consideration of this matter.

Respectfully submitted,



Elizabeth K. Quinn  
Assistant Federal Defender  
(914) 428-7133

cc: Jennifer Ong, AUSA  
Leonthe Barrios, PTO  
Mr. Andrew Perkins

*Granted.*

SO ORDERED



KENNETH M. KARAS U.S.D.J.

*8/16/2021*

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<sup>1</sup> Rolla, Missouri is located in Phelps County, which is in the Eastern District of Missouri, but borders the Western District of Missouri.